

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC., PRODUCTS LIABILITY)
LITIGATION)
) MDL No.: 2419
) Master Docket No.: 1:13-md-2419-FDS
_____)
THIS DOCUMENT RELATES TO:)
)
Wray)
Temple)
McElwee)
Skelton)
_____)

**JOINT MOTION TO MODIFY CASE MANAGEMENT DEADLINES IN
BELLWETHER CASES**

The Plaintiffs' Steering Committee ("PSC") and the Nashville Healthcare Defendants move the court to extend the case-specific fact and expert discovery deadlines contained in Dkt. No. 2827.

The parties have diligently attempted to meet the deadlines set in Dkt. No. 2827, but due to scheduling conflicts with third parties and experts – most of whom are practicing physicians with ongoing medical practices – the parties have been unable to complete discovery in the bellwether cases in the schedule established in Dkt. No. 2827. The parties reasonably believe that this discovery can be completed by June 10, 2016. The parties apologize for not bringing this matter to the Court's attention previously, but the parties have been meeting and conferring on a date that would be feasible for all parties and witnesses involved.

Accordingly, the parties respectfully request the Court extend the deadline for fact and expert discovery and the deadline for motions related thereto set forth in Dkt. No. 2827 to June 10, 2016.

Date: May 20, 2016

Respectfully submitted:

/s/ Benjamin A. Gastel

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Plaintiffs' Steering Committee and TN Chair

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CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing *Motion to Modify Case Management Deadlines in Bellwether Cases* to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: May 20, 2016

/s/ Benjamin A. Gastel
Benjamin A. Gastel